ISO 14001 COMMUNICATION (4.4.3)

In order to be in conformance with this provision of ISO 14001 an organization must be able to answer the overall question: "What communication system needs to be established?". In order to answer that question three specific points need to be addressed. First, the organization must establish and maintain a procedure to facilitate internal communication within the organization with respect to the overall environmental management system. Second, the organization must establish a system for receiving and responding to communication from external parties. Third, the organization should determine whether it will communicate to external parties information on its significant environmental aspects.

The internal communication requirement does not introduce any significant new requirements. The general awareness training that has already been outlined under Section 4.4.2 provides the foundation for response to this point. The development and transmission of the Environmental Policy statement, Significant Environmental Aspects, and the Environmental Objectives and Targets is the core of the environmental management system.

The standard contains the word "relevant" in the clause relating to external communication. The organization should track all external communications, and respond when it considers the question and/or communication to be "relevant" to its products, services and/or activities. It is left to the organization to determine what is a "relevant" communication.

The final requirement of this section of the standard is that the organization should decide whether it will communicate information about its significant environmental aspects to outside parties. There is no specific requirement in the standard that the organization provide any information beyond its Environmental Policy statement to external parties. The organization must only "record its decision" as to whether it will communicate this information to outside parties.

This section of the ISO 14001 standard is very **"grey"**. It is obvious that with respect to the functioning of the environmental management system that efficient and timely communication would be beneficial. Therefore, the standard requires efficient internal communication. With respect to external party communication then standard basically leaves it up to the organization as to how it desires to communicate by relying on the words "relevant" and "record its decision".

Questions That Need To Be Answered:

 The following questions will need to be answered in order to determine whether the Communication Section meets the intent of ISO 14001:

1.   Does the organization have an internal communication process for the environmental management system?

2.   Does the organization have a process in place for receiving and responding to "relevant" external communications?

3.   Has the organization decided whether it will communicate to external parties information with respect to its significant environmental aspects?

4.   If the organization has decided not to communicate information to external parties with respect to its significant environmental aspects, has it established a record of that decision?